

Plaintiff hereby moves this Court for an Order that approves an award of attorneys' fees and reimbursement of expenses in the amount of \$210,000 for the benefits achieved by Plaintiff's counsel. In support of this Motion, Plaintiff submits herewith a Memorandum of Law and the Declaration of Marc L. Ackerman ("Ackerman Decl.").¹

Dated: August 7, 2015

LAW OFFICE OF ALFRED G. YATES, JR.

/s/ Gerald L. Rutledge
Alfred G. Yates, Jr. (PA 17419)
Gerald L. Rutledge (PA 62027)
519 Allegheny Building
429 Forbes Avenue
Pittsburgh, PA 15219
(412) 391-5164
(412) 471-1033 (fax)
yateslaw@aol.com

OF COUNSEL:

BRODSKY & SMITH, LLC

Evan J. Smith
Marc L. Ackerman
Two Bala Plaza, Suite 510
Bala Cynwyd, PA 19004
(610) 667-6200

Attorneys for Plaintiff James Elliott

¹ All capitalized terms, unless otherwise defined herein, shall have the meaning set forth in the Stipulation and Agreement of Compromise and Settlement, dated April 28, 2015 which is attached as Exhibit 1 to the Ackerman Decl.